

IN RE: PETITIONS FOR SPECIAL HEARING \* BEFORE THE  
AND ZONING VARIANCE - N/S of \* DEPUTY ZONING COMMISSIONER  
Townsend Rd. 100' W of Mace Ave. (336 Townsend Road)  
15th Election District \* OF BALTIMORE COUNTY  
5th Councilmanic District \* Case No. 90-65-SPHA  
Charles Roger Dennison, et ux  
Petitioners \* \* \* \* \*

SECOND AMENDED ORDER

WHEREAS, the Petitioners requested a special hearing to approve that the use of the subject property for bible study constituted a church and that said church complies to the extent possible with RTA use requirements, and variances for an existing dwelling, in accordance with the plan submitted and identified as Petitioner's Exhibit 1;

WHEREAS, the relief requested was granted on January 4, 1990, subject to restrictions;

WHEREAS, Counsel for Petitioners requested an extension of time in which to comply with Restriction No. 2 of said Order;

WHEREAS, an extension of 120 days was granted by Amended Order on February 12, 1990;

WHEREAS, Counsel for Petitioners has requested a second extension of time for Petitioners to comply with Restriction No. 2 and has advised the Deputy Zoning Commissioner that Petitioners are diligently pursuing this matter in good faith;

IT IS ORDERED by the Deputy Zoning Commissioner for Baltimore County this 11/18 day of June, 1990 that Restriction No. 2 of the Order issued January 4, 1990 be and the same is hereby AMENDED to allow Petitioners an additional one hundred-twenty (120) days from the date of this Second Amended Order in which to comply with said restriction.

ANN M. NASTAROWICZ  
Deputy Zoning Commissioner  
for Baltimore County

AMM:bjs  
cc: Addressees Attached

Second Amended Order  
SPHA for Dennison  
Case No. 90-65-SPHA  
Page 2

cc: Thomas P. Dore, Esquire  
614 Bosley Avenue, Towson, Md. 21204

Mr. & Mrs. H. Clyde Merchant  
328 Townsend Road, Baltimore, Md. 21221

Mr. & Mrs. Thomas B. Simmons  
330 Townsend Road, Baltimore, Md. 21221

Mr. & Mrs. Frank Coxon, Sr.  
326 Townsend Road, Baltimore, Md. 21221

People's Counsel

File

ORDER RECEIVED FOR FILING  
Date 6/19/90  
By [Signature]

IN RE: PETITION FOR SPECIAL HEARING \* BEFORE THE  
AND ZONING VARIANCE - N/S Town- \* DEPUTY ZONING COMMISSIONER  
and Rd., 100' W of Mace Ave. (336 Townsend Road)  
15th Election District \* OF BALTIMORE COUNTY  
5th Councilmanic District \* Case No. 90-65-SPHA  
Charles Roger Dennison, et ux  
Petitioners \* \* \* \* \*

AMENDED ORDER

WHEREAS, the Petitioners requested a special hearing to approve that use of the subject residential property for bible study constitutes a church and that said church complies to the extent possible with R.T.A. use requirements; and variances to permit a front yard setback of 25 feet in lieu of the required 40 feet and side yard setbacks of 8.5 feet and 15 feet, respectively, in lieu of the required 20 feet for both, in accordance with the plan submitted and identified as Petitioner's Exhibit 1;

WHEREAS, the relief requested was granted, subject to restrictions, on January 4, 1990;

WHEREAS, Counsel for Petitioners requested an extension of time in which to comply with Restriction No. 2 of said Order;

IT IS ORDERED by the Deputy Zoning Commissioner for Baltimore County this 18th day of February, 1990 that Restriction No. 2 of the Order issued January 4, 1990 be and the same is hereby AMENDED to allow Petitioners one hundred-twenty (120) days from the date of this Amended Order to comply with the conditions set forth in Restriction No. 2.

ANN M. NASTAROWICZ  
Deputy Zoning Commissioner  
for Baltimore County

AMM:bjs

cc: See Attached List of Addressees

ORDER RECEIVED FOR FILING  
Date 2/18/91  
By [Signature]

ORDER RECEIVED FOR FILING  
Date 2/18/91  
By [Signature]

Amended Order  
SPHA for Dennison  
Case No. 90-65-SPHA  
Page 2

Thomas P. Dore, Esquire  
614 Bosley Avenue, Towson, Md. 21204

Mr. & Mrs. H. Clyde Merchant  
328 Townsend Road, Baltimore, Md. 21221

Mr. & Mrs. Thomas B. Simmons  
330 Townsend Road, Baltimore, Md. 21221

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326 Townsend Road, Baltimore, Md. 21221

People's Counsel

File

IN RE: PETITION FOR SPECIAL HEARING \* BEFORE THE  
AND ZONING VARIANCE - N/S Town- \* DEPUTY ZONING COMMISSIONER  
and Rd., 100' W of Mace Ave. (336 Townsend Road)  
15th Election District \* OF BALTIMORE COUNTY  
5th Councilmanic District \* Case No. 90-65-SPHA  
Charles Roger Dennison, et ux  
Petitioners \* \* \* \* \*

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Petitioners herein request a special hearing to approve that the use of the subject residential property for bible study constitutes a church and that said church complies to the extent possible with R.T.A. use requirements; and variances to permit a front yard setback of 25 feet in lieu of the required 40 feet and side yard setbacks of 8.5 feet and 15 feet, respectively, in lieu of the required 20 feet for both, all as more particularly described in Petitioner's Exhibit 1.

The Petitioners appeared, testified and were represented by Thomas P. Dore, Esquire. Appearing as Protestants in the matter were H. Clyde and Sadie E. Merchant, Thomas B. and Veronica Simmons, and Frank and Mildred Coxon, Sr., all residential property owners in the neighborhood.

Testimony indicated that the subject property, known as 336 Townsend Road, consists of 10,000 sq.ft., zoned D.R. 5.5 and is improved with a single family dwelling currently used as a private residence and for worship services and bible study meetings for the Crusaders for Christ Ministry, Inc., of which Mr. Dennison is the minister. Petitioners testified they have lived on the subject property since November 1983 at which time they rented the property until approximately January 1989 when they purchased the subject site. Testimony and documentation submitted indicated that Petitioners are members of Crusaders for Christ Ministry, Inc.,

organized in the State of Maryland in 1983 as a "religious corporation." Mr. Dennison testified that he is an ordained minister through the Gates of Christ Church out of Newport News, Virginia. He testified that since March, 1985, he has conducted various bible study and "worship services" at the subject site. Originally, the bible study meetings consisted of the Petitioners holding bible study meetings in the living room with Mrs. Dennison's mother who resides with them, their niece who is now 14 years of age and also resides with them, their son, who at that time was 33 and resided off the premises, and a friend of his. Mr. Dennison testified they would take a chapter of the bible and after reading the verses, each member would expound upon its meaning. Subsequently, testimony indicated that the Petitioners improved their basement to hold bible study meetings and worship services. Testimony indicated that at the present time, there is a bible study group which meets on Monday evenings and whose participants include the 4 residents of the home to as many as 16 individuals. Testimony indicated that many of the individuals coming to the home are relatives of the Petitioners. On Thursday and Sunday evenings, a worship service is held consisting of opening prayer, and thereafter inviting prayer requests, singing of hymns, bible readings and reflections. Testimony indicated that the maximum number of people who attend at this time is anywhere from 16 to 18, including the residents of the home. Eight of the individuals are members of the church, with the occasional attendance of 8 to 10 additional persons who are non-members. Additionally, on Sunday mornings there is Sunday School at 10:00 AM with worship service at 11:00 AM which only draws one other person from the outside.

Mr. Dennison testified that the subject dwelling was constructed sometime in the 1940s with the only exterior change being that of an addi-

tional exterior exit from the basement as required after an inspection of the premises by the Fire Department. Petitioners testified they contacted the Fire Department on their own to insure that the use of the basement for worship services was not a safety hazard. Petitioners testified that the existing setbacks for the home are those that were in effect at the time of its construction and prior to the effective date of the zoning regulations. Petitioners argued that denying the requested variances would result in practical difficulty and unreasonable hardship to them without any benefit to the health, safety or general welfare of the community. Petitioners further contend that the subject property meets the requirements of the residential transition area regulations as completely as possible. Subsequent to the hearing in further support of their position, Petitioners submitted corporate documentation verifying the recognition of Crusaders for Christ, Inc. as a non-profit corporation in good standing by the Department of Assessments and Taxation and a site plan depicting landscaping which has been submitted to the Baltimore County Landscape Planner for approval. Petitioners shall supply information verifying recognition by the Internal Revenue Service that the Crusaders for Christ, Inc. is a religious non-profit corporation.

The Protestants initially questioned whether Petitioners were proposing to construct an addition to the existing dwelling for use as a church as the hearing notice referenced the issuance of permits. The Protestants were advised there would be no exterior changes to the existing dwelling. The Protestants expressed concern as to Petitioners' placing a sign on the property as apparently a few years ago, the Petitioners had placed a large, lighted sign in the front of the property. After complaints from the neighbors, the sign was removed. The Petitioners agreed there

would be no exterior signs for the church. Further, the Protestants were concerned that the number of individuals attending the services will increase thereby creating a parking problem greater than that already existing. Petitioners contend that generally the visitors to the church park either in one of the five spaces as set forth in Petitioner's Exhibit 1, in front of their house on the street, or in front of adjoining neighbors' homes without objection as evidenced by Petitioner's Exhibits 2A through 2C. The Protestants disagree and contend that on numerous occasions, parking by visitors to the subject property has occurred in front of their homes.

After due consideration of the testimony and evidence presented, it is clear that a practical difficulty or unreasonable hardship would result if the relief requested in the special hearing were not granted. In the opinion of the Deputy Zoning Commissioner, the testimony and evidence presented tends to show that the Petitioners shall comply with R.T.A. requirements to the extent possible and that the nature of the subject property and the use of the basement of the existing dwelling as a church for bible study meetings and worship services, as restricted hereinafter, is compatible with the character of the surrounding residential properties. The Petitioners have met their burden on the issue of the Petition for Special Hearing and therefore, the relief requested herein should be granted, subject to restrictions as more particularly described below.

An area variance may be granted where strict application of the zoning regulations would cause practical difficulty to the Petitioner and his property. McLean v. Soley, 270 Md. 208 (1973). To prove practical difficulty for an area variance, the Petitioner must meet the following:

- 1) whether strict compliance with requirement would unreasonably prevent the use of the property for a

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Date 1/18/91  
By [Signature]

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By [Signature]

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Date 1/18/91  
By [Signature]



permitted purpose or render conformance unnecessarily burdensome;

2) whether the grant would do substantial injustice to applicant as well as other property owners in the district or whether a lesser relaxation than that applied for would give substantial relief; and

3) whether relief can be granted in such fashion that the spirit of the ordinance will be observed and public safety and welfare secured.

Anderson v. Bd. of Appeals, Town of Chesapeake Beach, 22 Md. App. 23 (1974).

It is clear from the testimony that if the variance is granted, such use as proposed would not be contrary to the spirit of the B.C.Z.R. and would not result in substantial detriment to the public health, safety, and general welfare. The variances requested do not change the physical layout of the dwelling constructed in the 1940s, and other than the exterior basement side entrance which was added for fire safety code requirements, the dwelling is compatible with the surrounding homes.

Pursuant to the advertisement posting of the property, and public hearing on these Petitions held, and for the reasons given above, the special hearing and variances should be granted.

THEREFORE, IT IS ORDERED by the Deputy Zoning Commissioner for Baltimore County this 4th day of January, 1990 that the Petition for Zoning Variance to permit a front yard setback of 25 feet in lieu of the required 40 feet and side yard setbacks of 8.5 feet and 15 feet, respectively, in lieu of the required 20 feet for both, in accordance with Petitioner's Exhibit 1, be and is hereby GRANTED; and,

IT IS FURTHER ORDERED that the use of the subject residential property for bible study and worship services constitutes a church and that said church complies to the extent possible with R.T.A. use requirements.

- 5 -

ments, and as such, the Petition for Special Hearing is GRANTED, subject, however, to the following restrictions which are conditions precedent to the relief granted:

1) The Petitioners may apply for their occupancy permit and be granted same upon receipt of this Order; however, Petitioners are hereby made aware that proceeding at this time is at their own risk until such time as the 30-day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioners would be required to return, and be responsible for returning, said property to its original condition.

2) Within thirty (30) days of the date of this Order Petitioners shall submit proof of recognition by the Internal Revenue Service that Crusaders for Christ Ministry, Inc. is a tax exempt, non-profit religious corporation.

3) The relief granted herein is conditioned upon Crusaders for Christ Ministry, Inc. maintaining good status with the State of Maryland and the Internal Revenue Service as a tax exempt, non-profit religious corporation and Petitioners shall submit proof of such on an annual basis to the Zoning Commissioner's Office within thirty (30) days upon receipt of request.

4) The special hearing granted herein is limited to the use of the basement of the dwelling on the subject property by the Crusaders for Christ Ministry, Inc. as a church with all other portions of the dwelling used for residential purposes only. Further, the relief granted herein is limited to one weekday evening worship service and/or bible study meeting, ending no later than 9:30 PM, and Sunday services, with Sunday School beginning no earlier than 9:00 AM and worship services ending no later than 9:00 PM.

5) At no time shall there be greater than 20 people attending services or bible study meetings on the subject property at any one time. Petitioners shall keep accurate records of its membership, meeting dates and times, and attendance and shall, upon reasonable notice, permit a representative of the Zoning Office to review same and inspect the subject property to insure compliance with the terms and conditions of this Order.

6) Petitioners shall landscape the property in a manner determined appropriate by the Baltimore County Landscape Planner to insure there is an adequate buffer

- 6 -

er and transition area between the subject property and adjoining properties. An approved landscape plan shall be submitted to the Zoning Commissioner's Office for inclusion in the case file within forty-five (45) days of the date of this Order.

7) There shall be no extra signs on the property other than those permitted as of right for identification of the use of the property as a residence.

8) When applying for a building permit, the site plan and landscaping plan filed must reference this case and set forth and address the restrictions of this Order.

ANN M. NASTAROWICZ  
Deputy Zoning Commissioner  
for Baltimore County

ANN:bjs

COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
614 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 301  
822-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER  
MARK S. DEWANE  
ANTHONY J. DIPALUA  
THOMAS R. DORE

February 5, 1990

HAND DELIVERED

Ann M. Nastarowicz  
Deputy Zoning Commissioner for  
Baltimore County  
Office of Planning & Zoning  
111 W. Chesapeake Avenue  
Towson, Maryland 21204

RE: ZONING PETITION  
CASE NO.: 90-65 SPHA  
336 TOWNSEND ROAD  
CHARLES R. DENNISON, ET UX.

Dear Ms. Nastarowicz:

Pursuant to your Order of November 4, 1989 in the above-captioned action, my clients have undertaken to file for status as a tax exempt organization with the Internal Revenue Service. Upon receipt of the Order, my clients immediately contacted the Internal Revenue Service and were advised that the necessary paperwork was being forwarded to them, however, as of this date they have not received the paperwork. They were further advised that the time frame in which the IRS takes to review this matter and to grant tax exempt status would not be in compliance with your Order. Accordingly, I would request that you consider an extension of time in which to receive our approval as a tax exempt organization.

I have enclosed herewith a copy of the approved Landscape Plan which is to be filed pursuant to your Order of January 4. Thank you for your consideration.

Very truly yours,

Thomas P. Dore

TPD/cab

2 cb-5

cc: Mr. and Mrs. Charles Dennison

PETITION FOR SPECIAL HEARING & VARIANCE  
TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY: 90-65-SPHA

The undersigned, legal owner(s) of the property situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition for a Special Hearing under Section 500.7 of the Baltimore County Zoning Regulations, to determine whether or not the Zoning Commissioner and/or Deputy Zoning Commissioner should approve, by... determining that the existing use of the property is a church and to determine that a church (in a home) meets compliance to the extent possible with the use requirements. SECTION 1802.2(B) (V.B.2 CDDP) -- to allow a front yard setback of 25 ft. and side yard setbacks of 8.5 ft. and 15 ft. in lieu of the required 40 ft., 20 ft. and 20 ft. respectively.

Property is to be posted and advertised as prescribed by Zoning Regulations.

I, or we, agree to pay expenses of the above Special Hearing advertising, posting, etc., upon filing of this Petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

I/We do solemnly declare and affirm under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

Contract Purchaser:

(Type or Print Name)

Signature

Address

City and State

Attorney for Petitioner:

(Type or Print Name)

Signature

Address

City and State

Attorney's Telephone No.:

Address

Phone No.

ORDERED By The Zoning Commissioner of Baltimore County, this 14th day of June, 1989, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 108, County Office Building in Towson, Baltimore County, on the 30th day of May, 1989, at 9:30 o'clock A.M.

ESTIMATED LENGTH OF HEARING 1-2 HRS.

AVAILABLE FOR HEARING MON./TUES./WED. - NEXT TWO MONTHS

ALL OTHER DATE 5-26-89 (over)

REVIEWED BY: [Signature] DATE 5-26-89 (over)

Phone: 687-6922

FRANK S. LEE

Registered Land Surveyor

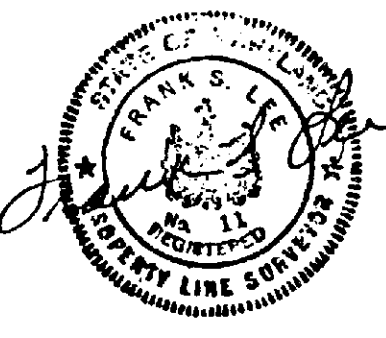
1277 NEIGHBORS AVE. - BALTIMORE, MD. 21237

April 12, 1989

No. 336 Townsend Road  
Lot 72, Section "E", Back River Highlands, 4/64 & 65  
15th District Baltimore County, Maryland

Beginning for the same on the northeast side of Townsend Road at the distance of 1000 feet measured northwesterly along the northeast side of Townsend Road from the west side of Mace Avenue thence running and binding on the northeast side thereof North 64 degrees 16 minutes 17 seconds West 50 feet, thence leaving Townsend Road for three lines of division as follows: North 25 degrees 43 minutes 43 seconds East 200 feet, South 64 degrees 16 minutes 17 seconds East 50 feet and South 25 degrees 43 minutes 43 seconds West 200 feet to the place of beginning.

Containing 10,000 square feet of land:



COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
614 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 301  
822-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER  
MARK S. DEWANE  
ANTHONY J. DIPALUA  
THOMAS R. DORE

\* ADMITTED TO D. C. BAR

May 31, 1990

RECEIVED  
JUN 1 1990

ZONING OFFICE

Ann M. Nastarowicz, Esquire  
Deputy Zoning Commissioner  
for Baltimore County  
Office of Zoning  
Baltimore County Office Building  
111 W. Chesapeake Avenue  
Towson, Maryland 21204

RE: Petition for Special Hearing on Zoning Variance  
336 Townsend Road  
Case No.: 90-65-SPHA

Dear Ms. Nastarowicz:

As you may recall this office represents Charles and Eleanor Dennison, Petitioners in the above captioned matter. The Dennisons petitioned for a Special Hearing to approve the use of their residence for a bible study church. Restriction No. 2 of your Order granting the variance requested that they supply proof of the recognition by the Internal Revenue Service that their corporation is a tax exempt non-profit religious corporation. My clients have 1990 that as of that date they had not received the recognition from the Internal Revenue Service, however, they are diligently pursuing the letter of publication which will give their corporation the required status.

My clients advise me that in the spirit of cooperation with the Zoning Office, they undertook negotiations and have now been permitted to use the Del Mar Baptist Church located at 2925 Del Mar Avenue, Edgemere, Maryland for services on a temporary basis. My clients have advised me that the Del Mar Baptist Church has agreed to let them use their facility until August 1, 1990, and as such, my client would ask that you again extend the period by which they can meet the requirements of Restriction No. 2 of your January 4, 1990 Order. While I recognize this matter has drawn on for some considerable length of time, I can assure you that my clients are honestly and conscientiously pursuing the letter of publication

Ann M. Nastarowicz, Esquire  
May 31, 1990  
Page 2

from the Internal Revenue Service. As you know, occasionally, the bureaucracy slows things down to the point where that individual can have no control. Your consideration in this matter will be greatly appreciated.

Very truly yours,

Thomas P. Dore

TPD/bjs

cc: Mr. and Mrs. Charles Dennison  
5 bjs.146



TO: ROBERT HAINES  
ZONING COMMISSIONER OF BALTIMORE COUNTY

SIR:

WE, THE UNDERSIGNED RESIDENTS OF THE 300 BLOCK OF TOWNSEND ROAD, ESSEX, MARYLAND, DO RESPECTFULLY PETITION THE ZONING BOARD OF BALTIMORE COUNTY TO DENY THE REQUEST FOR ISSUANCE OF A ZONING VARIANCE AND A BUILDING PERMIT AT 336 TOWNSEND ROAD. WE ARE CONCERNED ABOUT THE IMPACT THAT THE ESTABLISHMENT OF A BIBLE CHURCH IN A PRIVATE RESIDENCE WOULD HAVE ON STREET PARKING, ACCESS TO DRIVEWAYS, POSSIBLE NOISE LEVELS AND PROPERTY VALUES OF OUR HOMES.

Beattie Muenzing 309 Townsend Rd 21221  
Linda Di Battista 312 Townsend Rd 21221  
Anthony Di Battista 313 Townsend Rd 21221  
Blamena Di Battista 312 Townsend Rd 21221  
Joseph Herfel 308 Townsend Rd Baltimore, MD 21221  
Don Paul 315 Townsend Rd Baltimore 21221  
Phyllis Chiving 310 Townsend Rd Baltimore 21221  
Cale Russell 315 Townsend Rd Baltimore 21221  
Erin Lee 299 Townsend Rd  
Linda Weiss 314 Townsend Rd  
Arthur Carroll 338 Townsend Rd 21221

TO: ROBERT HAINES  
ZONING COMMISSIONER OF BALTIMORE COUNTY

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Larry P. Ellis 338 Townsend Rd 21221  
William Klop 340 Townsend Rd 21221  
Andrew Jacobs 348 Townsend Rd 21221  
N. Clyde Dugan 328 Townsend Rd 21221  
Charlotte Owens 369 Townsend Rd 21221  
Hattie Anna Treadway 314 Townsend Rd 21221  
Laura J. Hayes 340 Townsend Rd 21221  
Delmar Alexander 359 Townsend Rd 21221  
Marilyn J. Bough 352 Townsend Rd 21221  
Emma M. Halderman 350 Townsend Rd 21221  
Donald S. Kinn 346 Townsend Rd

TO: ROBERT HAINES  
ZONING COMMISSIONER OF BALTIMORE COUNTY

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Samuel Weber 345 Townsend Rd 21221  
James Logan 353 Townsend Rd 21221  
Margaret Russell 357 Townsend Rd 21221  
Pat Nielsen 322 Townsend Rd 21221  
John L. Huns 324 Townsend Rd 21221  
Franklin Patterson 335 Townsend Rd 21221  
Reginald Wood 337 Townsend Rd 21221  
Urania Head 337 A Townsend Rd 21221  
Mrs. M. Headmark J. Huns 339 Townsend Rd  
Frederick J. Huns Jr 339 Townsend Rd  
Lillian S. Huns 341 Townsend Rd 21221

TO: ROBERT HAINES  
ZONING COMMISSIONER OF BALTIMORE COUNTY

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Lucie H. Dudley 357 Townsend Rd Baltimore 21221  
Rudolph J. Ferguson 354 Townsend Rd Baltimore 21221  
Curtis R. Kuchner 349 Townsend Rd Baltimore, MD  
Mary W. Hinkle 351 Townsend Rd 21221  
Thomas R. Dimmock 330 Townsend Rd 21221  
Marie A. Almon 339 Townsend Rd 21221  
Marie Spangler 340 Townsend Rd  
" " " "  
Nancy L. Linder 311 Townsend Rd  
Ruth A. Huns 310 Townsend Rd  
Joyce Chiving 310 Townsend Rd

TO: ROBERT HAINES  
ZONING COMMISSIONER OF BALTIMORE COUNTY

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Kenneth Chiving 310 Townsend Rd  
Harry L. Brown 322 Townsend Rd  
E. C. Dugan 301 Townsend Rd  
G. A. Zaher 303 Townsend Rd  
Christopher W. Linder 305 Townsend Rd  
Alan J. Linder 305 Townsend Rd  
Isabel Cotton 326 Townsend Rd  
Michelle Cotton 326 Townsend Rd  
Evelyn Brown 333A Townsend Rd  
Glen R. Brown 333A Townsend Rd  
Claudia M. Wise 337 Townsend Rd

PLEASE PRINT CLEARLY

PETITIONER(S) SIGN-IN SHEET

NAME	ADDRESS
Charles R. Dennison	336 Townsend Road
Charles R. Dennison	336 Townsend Road
Thomas P. Oore	114 Leslie Ave
Lot 114	Town and 21221
	(301) 391-4441

PLEASE PRINT CLEARLY

PROTESTANT(S) SIGN-IN SHEET

NAME	ADDRESS
Kelly B. Zupke	338 Townsend Rd 21221
John E. Zupke	338 Townsend Rd
Thomas B. Dimmock	330 Townsend Rd
Theresa L. Dimmock	330 Townsend Rd 21221
Michelle Cotton	326 Townsend Rd 21221
James L. Cotton	326 Townsend Rd 21221

CRUSADER'S FOR CHRIST MINISTRY

P.O. Box 7883  
Baltimore, MD 21221  
(301) 391-6170

October 17, 1989

To Whom It May Concern:

At the request of Reverend Charles R. Dennison, 336 Townsend Road, I have been asked to provide this statement concerning activities at their residence.

I have been a neighbor of the Dennison's ever since they started having meetings on a weekly basis.

This is a loving, caring, Christian household. As a neighbor, I have no objections for them to continue as it has been over the past several years.

Please disregard any other petition I may have signed. I did not fully understand what it was about.

If I can be of any further assistance, feel free to contact me at any time.

Sincerely,

Charles T. Jackson 334 Townsend Rd Baltimore, MD 21221

CRUSADER'S FOR CHRIST MINISTRY

P.O. Box 7883  
Baltimore, MD 21221  
(301) 391-6170

October 17, 1989

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Sincerely,

Claudia M. Wise  
337 Townsend Rd  
Baltimore, Md.  
21221



CRUSADER'S FOR CHRIST MINISTRY  
P.O. Box 7883  
Baltimore, MD 21221  
(301) 391-6170

October 17, 1989

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If I can be of any further assistance, feel free to contact me at any time.

Sincerely,

Margaret Collett  
334 Townsend Rd.  
21221

COVAHEY & BOOZER, P. A.  
ATTORNEYS AT LAW  
814 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 301  
828-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER  
MARK S. DEWAN  
ANTHONY J. DIPALUA  
THOMAS P. DORE

FAX 301-296-2131

November 6, 1989

RECEIVED  
NOV 8 1989  
ZONING OFFICE

Ann Nastarowicz  
Deputy Zoning Commissioner  
111 W. Chesapeake Avenue  
Room 109  
Towson, Maryland 21204

RE: VARIANCE PETITION 336 TOWNSON ROAD  
CASE NO.: 9065 SPHA

Dear Ms. Nastarowicz:

Enclosed please find a copy of the Certificate of Good Standing for the Dennison's corporation as well as a copy of their State Tax Exempt Card. It is my understanding that they are in the process of attempting to obtain federal tax exempt status. This request is scheduled to be filed at the close of this tax year. I have also enclosed herewith a copy of their Federal I.D. Number.

If you need any additional information, please advise.

Very truly yours,

Thomas P. Dore

TPD/cab  
6 cb.1

enclosures

STATE OF MARYLAND 33273

# STATE DEPARTMENT OF ASSESSMENTS AND TAXATION

301 West Preston Street, Baltimore, Maryland 21201

I, BRENDA A. WALKER, OF THE STATE DEPARTMENT OF ASSESSMENTS AND TAXATION OF THE STATE OF MARYLAND, DO HEREBY CERTIFY THAT SAID DEPARTMENT, BY THE LAWS OF SAID STATE, IS THE CUSTODIAN OF THE RECORDS OF THIS STATE RELATING TO THE FORFEITURE OR SUSPENSION OF CORPORATE CHARTERS, OR OF CORPORATIONS TO TRANSACT BUSINESS IN THIS STATE; AND I AM THE PROPER OFFICER TO EXECUTE THIS CERTIFICATE.

I FURTHER CERTIFY THAT CRUSADERS FOR CHRIST MINISTRY, INC. IS A CORPORATION DULY INCORPORATED AND EXISTING UNDER AND BY VIRTUE OF THE LAWS OF MARYLAND AND SAID CORPORATION HAS FILED ALL ANNUAL REPORTS REQUIRED, HAS NO OUTSTANDING LATE FILING PENALTIES ON THOSE REPORTS, AND HAS A RESIDENT AGENT. THEREFORE, THE CORPORATION IS AT THE TIME OF THIS CERTIFICATE IN GOOD STANDING WITH THIS DEPARTMENT AND DULY AUTHORIZED TO EXERCISE ALL THE POWERS RECITED IN ITS CHARTER OR CERTIFICATE OF INCORPORATION, AND TO TRANSACT BUSINESS IN THE STATE OF MARYLAND.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIXED THE SEAL OF THE STATE DEPARTMENT OF ASSESSMENTS AND TAXATION OF MARYLAND AT BALTIMORE THIS 20TH DAY OF OCTOBER, 1989.

BRENDA A. WALKER  
OFFICE SUPERVISOR II



5-031

COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
814 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 301  
828-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER  
MARK S. DEWAN  
ANTHONY J. DIPALUA  
THOMAS P. DORE

FAX 301-296-2131

October 27, 1989

HAND DELIVERED

Ann Nastarowicz  
Deputy Zoning Commissioner  
111 W. Chesapeake Avenue  
Room 109  
Towson, Maryland 21204

RE: CASE NO.: 9065 SPHA

Dear Ms. Nastarowicz:

At the hearing on the above matter you requested that my office submit a Landscape Plan for the site with respect to the above. Please treat this as a request for an additional fifteen (15) days to submit the Plan.

I have enclosed herewith the documentation with respect to Mr. Dennison's ordination as a minister. I have also enclosed a copy of the Articles of Incorporation for the Dennison religious corporation.

Thank you for your assistance.

Very truly yours,

Thomas P. Dore

TPD/cab  
26 cb.15

enclosures

COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
814 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 301  
828-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER  
MARK S. DEWAN  
ANTHONY J. DIPALUA  
THOMAS P. DORE

FAX 301-296-2131

November 13, 1989

RECEIVED  
NOV 13 1989  
ZONING OFFICE

HAND DELIVERED

Ann Nastarowicz, Esquire  
Deputy Zoning Commissioner  
111 W. Chesapeake Avenue  
Room 109  
Towson, Maryland 21204

RE: VARIANCE PETITION 336 TOWNSON ROAD  
CASE NO.: 9065 SPHA

Dear Ms. Nastarowicz:

Enclosed please find copy of the Landscape Plan which was submitted to Mr. Avery Harden of the Office of Current Planning. Mr. Harden advised that he wanted to obtain your comments prior to advising my office of any changes which he would require. I have submitted this to you in an effort to satisfy the previous extension granted to file this information.

Please advise if you have had an opportunity to review this matter with Mr. Harden, and if not, please treat this as a request for an additional extension pending Mr. Harden's comments on the Plan.

Very truly yours,

Thomas P. Dore

TPD/cab  
13 cb.10

enclosure

11/13/89 The Tom Dore is available - I talked to him and he should contact him and provide him with photos of proposed signage area

COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
814 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 301  
828-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER  
MARK S. DEWAN  
ANTHONY J. DIPALUA

FAX 301-296-2131

August 31, 1989

RECEIVED  
SEP 1 1989  
ZONING OFFICE

J. Robert Haines  
Zoning Commissioner of Baltimore County  
Office of Planning and Zoning  
Baltimore County Office Building  
111 W. Chesapeake Avenue, Room 109  
Towson, Maryland 21204

RE: PETITION FOR SPECIAL HEARING AND VARIANCE  
90-65-SPHA  
PROPERTY OWNERS: CHARLES AND ELEANOR DENNISON

Dear Mr. Haines:

Please enter the appearance of Thomas P. Dore, Edward C. Covashey, Jr., and Covashey & Boozer, P.A. on behalf of the petitioners in the above-captioned matter.

Thank you for your cooperation.

Very truly yours,

Thomas P. Dore

TPD/cab  
31 cb.2

CERTIFICATE OF POSTING  
ZONING DEPARTMENT OF BALTIMORE COUNTY  
Towson, Maryland

District: 15th Date of Posting: 8/13/89  
Posted for: Special Hearing & Variance  
Petitioner: Charles Rogers, Dennis, et al.  
Location of property: 336 Townsend Rd., 1000 W. Chesapeake Ave.  
Location of Sign: 336 Townsend Rd., 1000 W. Chesapeake Ave.  
Remarks: On property of R. L. Haines  
Posted by: M. Haines Date of return: 8/15/89  
Number of Signs: 2

CRUSADERS FOR CHRIST MINISTRY INC  
REV CHARLES R DENNISON  
336 TOWNSEND RD  
BALTIMORE MD 21221

For assistance you may call us at:

9-2-2596-LOCAL BALTIMORE  
9-2-3161-7226-COLO  
1-800-424-1047-OTHER MD

or you may write to us at the address shown to the left. If you write, be sure to attach the bottom part of this notice.

## Notice of New Employer Identification Number Assigned

Thank you for your Form SS-4 Application for Employer Identification Number (EIN). The number assigned to you is shown above. This number will be used to identify your business account and related tax returns and documents.

Please keep a copy of this number in your permanent records. IRS uses the information provided on Form SS-4 to establish your taxpaying entity. Entity information includes your EIN, business name, trade name, street address, city, state and ZIP code. When filing tax documents or making FTD payments, it is important to use the IRS assigned label, and/or coupon. However, if this is not possible, your EIN and complete entity information as shown below must be used to properly identify your account and avoid processing delays. If for any reason this information is not correct, please return the bottom portion of this notice indicating the changes.

CRUSADERS FOR CHRIST MINISTRY INC  
REV CHARLES R DENNISON  
PO BOX 7883  
336 TOWNSEND RD  
BALTIMORE MD 21221

If your business is a partnership which must obtain prior approval for its tax year, the tax year you entered in Block 3 of your Form SS-4 does not establish a tax year. For guidance in determining if you must request prior approval and the method of doing so, see IRS Publication 538, Accounting Periods and Methods, available at most IRS offices.

Please note that the assignment of this number does not grant tax-exempt status to nonprofit organizations. Any organization (other than a private foundation) having annual gross receipts normally of not more than \$5,000 is exempt by statute if it meets the requirements of section 501(c)(3) of the Internal Revenue Code. These organizations are not required to file Form 1023 (Application for Recognition of Exemption) or file Form 990 (Return of Organization). Service and receive a ruling or determination letter recognizing its exempt status with the Internal Revenue District Director. For details on how to apply for this exemption, see IRS Publication 587, Tax-Exempt Status, and the Key Form 1023.

CERTIFICATE OF POSTING  
ZONING DEPARTMENT OF BALTIMORE COUNTY  
Towson, Maryland

District: 15th Date of Posting: 8/13/89  
Posted for: Special Hearing & Variance  
Petitioner: Charles Rogers, Dennis, et al.  
Location of property: 336 Townsend Rd., 1000 W. Chesapeake Ave.  
Location of Sign: 336 Townsend Rd., 1000 W. Chesapeake Ave.  
Remarks: On property of R. L. Haines  
Posted by: M. Haines Date of return: 8/15/89  
Number of Signs: 2

PLEASE PRINT CLEARLY

PROTESTANT(S) SIGN-IN SHEET

NAME	ADDRESS
FRANK COXON SR.	686 9384
336 Townsend Rd.	336 Townsend Rd. 686-5278
Thomas P. Dore	336 Townsend Rd.
William Rogers	336 Townsend Rd.

## CERTIFICATE OF PUBLICATION

TOWSON, MD, August 3, 1989

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md., appearing on August 3, 1989.

THE JEFFERSONIAN,

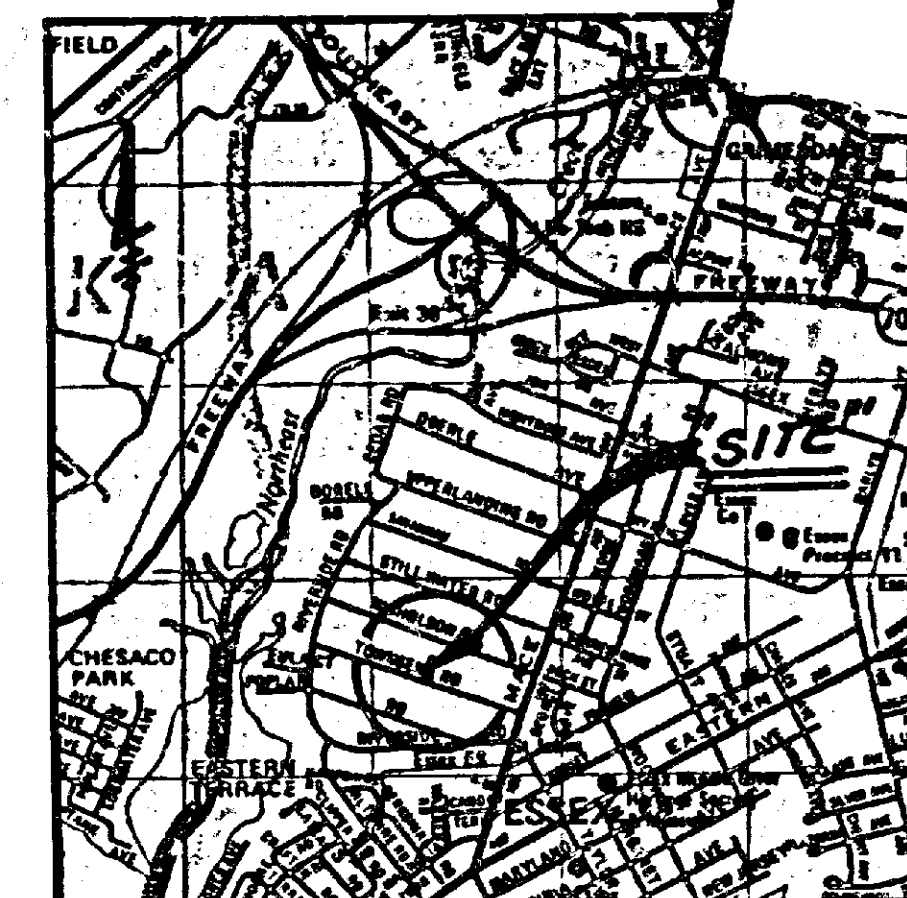
S. Zabe Orlow  
Publisher

PO 15117  
NY 131069  
ca 90-65-SPHA  
price \$47.28









LOCATION MAP  
SCALE: 1" = 2,000'

LANDSCAPING PLAN TO ACCOMPANY FOR A SPECIAL HEARING FOR TRANSITION REQUIREMENTS AND VARIANCES.  
SIDE YARD SETBACKS OF 15' AND 8.5 FEET IN LIEU OF THE REQUIRED 20 FEET.

PARKING DATA  
NO. OF PEOPLE ATTENDING SERVICE = 16  
1 SPACE PER 4 SEATS = 4 SPACES  
NO. OF SPACES PROVIDED = 5 SPACES

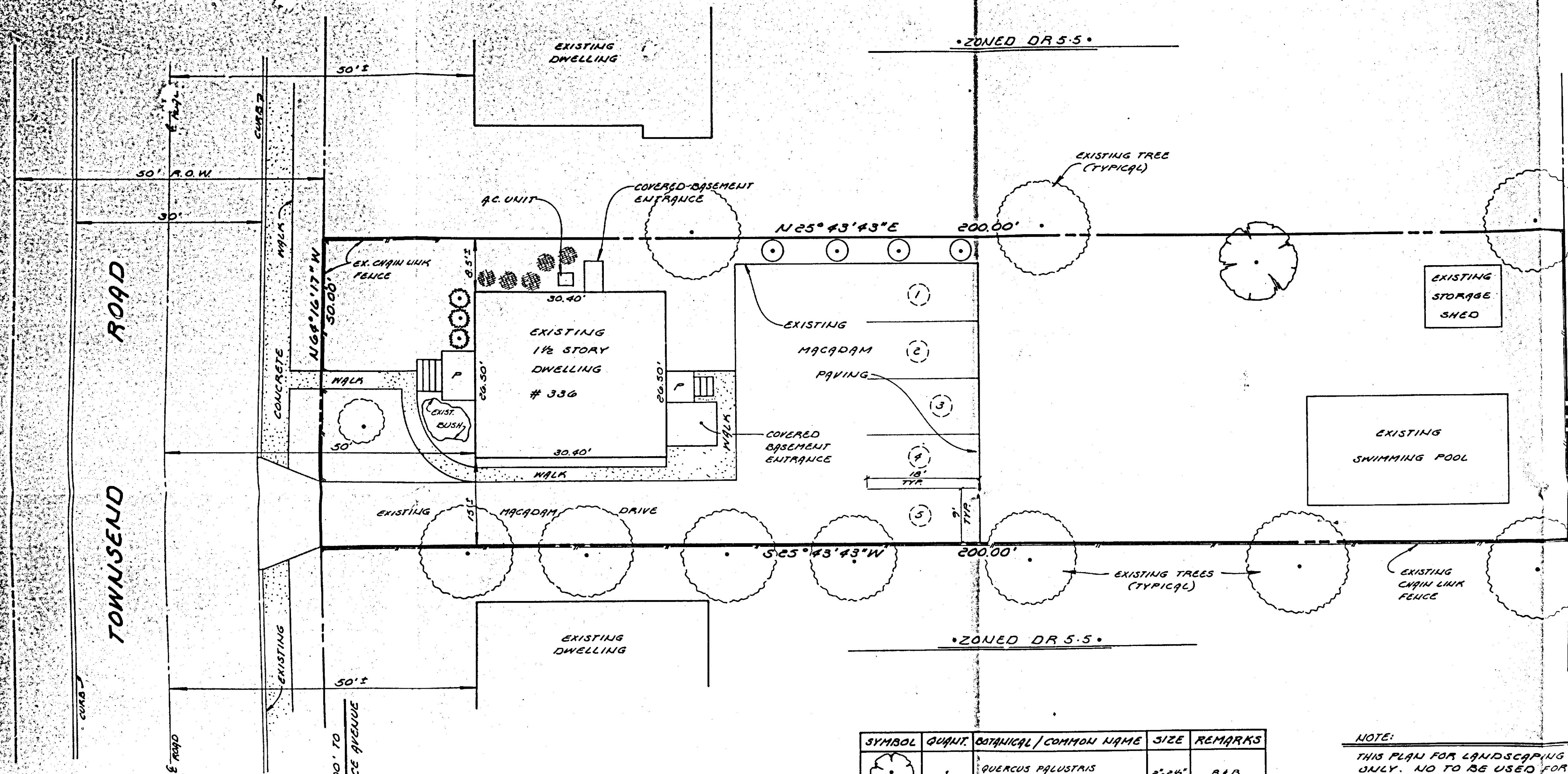
EXISTING ZONING = DR 5.5  
AREA OF LOT = 10,000 SQ. FT.  
LOT SERVICED BY PUBLIC WATER AND SEWER  
EXISTING USE = RESIDENCE AND CHURCH

LOT 12, SECTION "E"  
BACK RIVER HIGHLANDS  
PLAT BOOK 4/64-65  
DEED REFERENCE = 8089-452

"I certify that the planting plan shown herein is consistent with applicable policy, guidelines and ordinances, and that all plant material to be furnished will be nursery-grown in accordance with the specifications stated in the Baltimore County Landscape Manual, 1985."

Signature of Applicant \_\_\_\_\_ Date \_\_\_\_\_

Petitioner's Exhibit A  
*[Signature]*

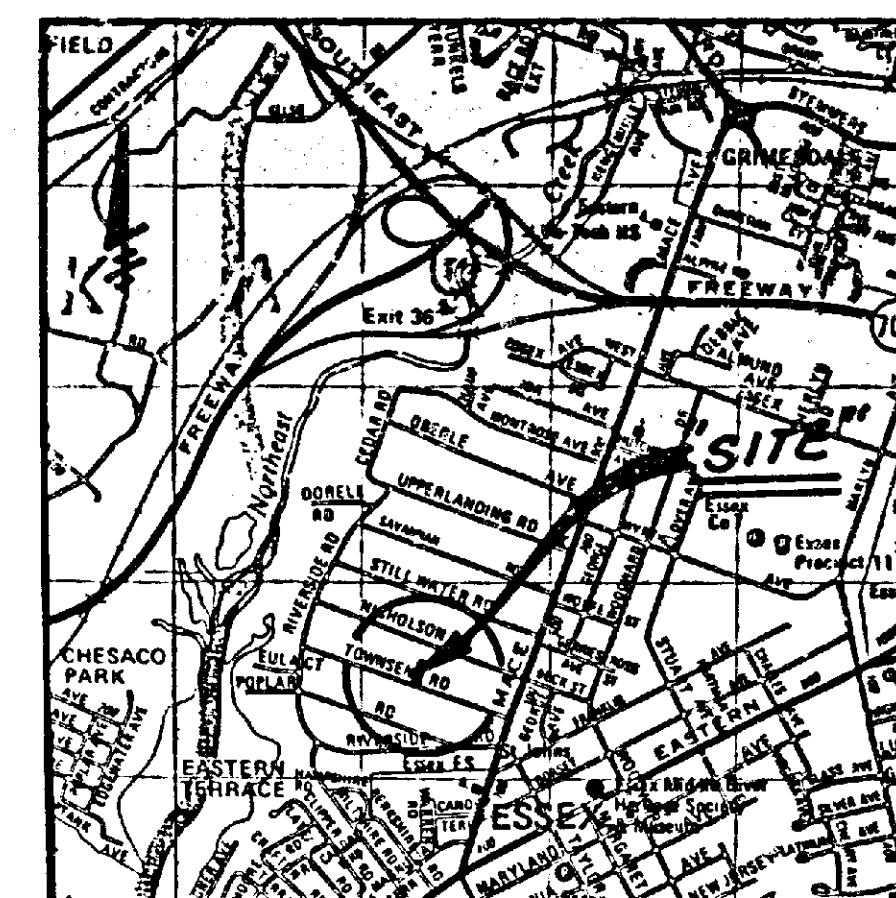


SYMBOL	QUANT.	BOTANICAL / COMMON NAME	SIZE	REMARKS
	1	QUERCUS PALUSTRIS (PIN OAK)	2" DBH	B.F.B.
	3	ILEX CORNUTA "GREEN LUSTER" (GREEN LUSTER HOLLY)	18"	B.F.B.
	6	EVONYMUS ALATUS (WINGED EVONYMUS)	30"	B.F.B. @ 10' O.C.
	5	JUNIPERUS CHINENSIS "PETER PAN JUNIPER" (GOLD TIP PETER PAN JUNIPER)	18"	B.F.B.

NOTE:  
THIS PLAN FOR LANDSCAPING USE ONLY. NO TO BE USED FOR ANY OTHER PURPOSE.  
BOUNDARY AND IMPROVEMENTS TRACED FROM PLAT PREPARED BY FRANK S. LEE 1277 NEIGHBORS AVE. BALTIMORE, MARYLAND.

<b>FREDERICK WARD ASSOCIATES INC.</b> ENGINEERS • ARCHITECTS • SURVEYORS 6 SOUTH MAIN STREET 301-879-2090	REVISIONS <table border="1"> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>																	<b>OWNER</b> CHAS. R. - ELEANOR DENNISON 336 TOWNSEND ROAD BALTIMORE, MARYLAND - 21221	<b>LANDSCAPE PLAN</b> 336 TOWNSEND ROAD 15TH ELECTION DISTRICT BALTIMORE COUNTY	DATE 11-1-89 SCALE 1" = 10' DRAWN BY R.O.S. SHEET 1 OF 1 FWA JOB NO.
BEL AIR, MARYLAND 301-833-7700		MARYLAND																		





LOCATION MAP

SCALE: 1" = 2,000'

LANDSCAPING PLAN TO ACCOMPANY FOR A SPECIAL HEARING FOR TRANSITION REQUIREMENTS AND VARIANCES.

SIDE YARD SETBACKS OF 15' AND 8.5 FEET IN LIEU OF THE REQUIRED 20 FEET.

PARKING DATA

NO. OF PEOPLE ATTENDING SERVICE = 16  
1 SPACE PER 4 SEATS = 4 SPACES  
NO. OF SPACES PROVIDED = 5 SPACES

EXISTING ZONING = DR 5.5

AREA OF LOT = 10,000 SQ. FT.

LOT SERVICED BY PUBLIC WATER AND SEWER

EXISTING USE = RESIDENCE AND CHURCH

LOT 72, SECTION "E"  
BACK RIVER HIGHWAYS  
PLAT BOOK #164-65  
DEED REFERENCE = 8089-452

"I certify that the planting plan shown herein is consistent with applicable policy, guidelines and ordinances, and that all plant material to be furnished will be nursery-grown in accordance with the specifications stated in the Baltimore County Landscape Manual, 1985.

*Charles R. Dennis* 11-17-89  
Signature of Applicant Date  
CHARLES R. DENNISON  
336 TOWNSEND ROAD  
BALTIMORE, MD - 21221

BALTIMORE COUNTY  
OFFICE OF PLANNING AND ZONING  
LANDSCAPE PLAN APPROVE

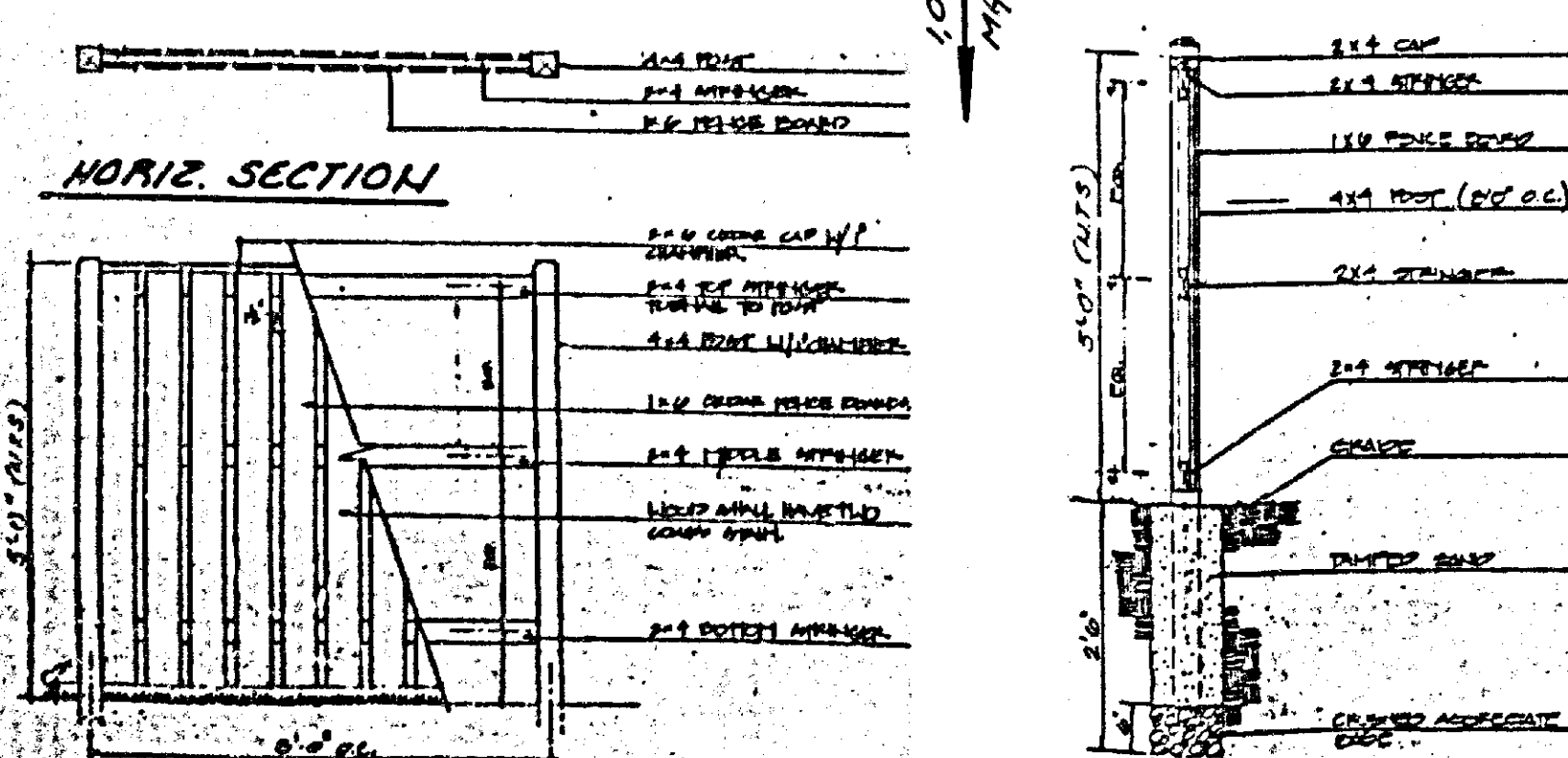
*Chen, Hal*  
date 11-24-89  
OFFICE OF PLANNING AND ZONING  
BALTIMORE COUNTY

NOTE:

THIS PLAN FOR LANDSCAPING USE ONLY. NO TO BE USED FOR ANY OTHER PURPOSE.

BOUNDARY AND IMPROVEMENTS TRACED FROM PLAT PREPARED BY FRANK S. LEE 1277 NEIGHBORS AVE. BALTIMORE, MARYLAND.

SYMBOL	QUANT.	BOTANICAL / COMMON NAME	SIZE	REMARKS
	1	QUERCUS PALUSTRIS (PIN OAK)	2" x 2"	B.F.B.
	3	ILEX CRENATA "GREEN LUSTER" (GREEN LUSTER HOLLY)	18"	B.F.B.
	4	EUONYMUS ALATUS (WINGED EUONYMUS)	30"	B.F.B. @ 10' O.C.
	5	JUNIPERUS CHINENSIS "FITZGERIARD AUREA" (GOLD TIP FITZGERIARD JUNIPER)	18"	B.F.B.



ELEVATION AND PLAN WOOD FENCE DETAIL  
NOT TO SCALE



FREDERICK WARD ASSOCIATES INC.  
ENGINEERS • ARCHITECTS • SURVEYORS  
5 SOUTH MAIN STREET  
301-879-2090  
BEL AIR, MARYLAND  
301-838-7900

REVISIONS
1. 11-17-89 ADD FENCE DETAIL

OWNER

CHAS. R. - ELEANOR DENNISON  
336 TOWNSEND ROAD  
BALTIMORE, MARYLAND - 21221

LANDSCAPE PLAN

336 TOWNSEND ROAD  
15TH ELECTION DISTRICT

BALTIMORE COUNTY

MARYLAND

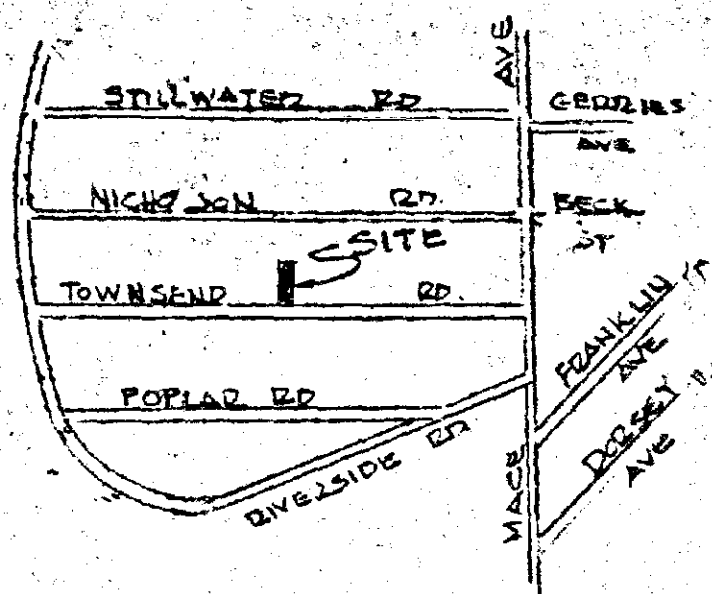
DATE 11-1-89  
SCALE 1" = 10'  
DESIGNED BY  
DRAWN BY R.O.S.  
DRAWING NO. 1  
SHEET OF 1  
PWA JOB NO. 90000

PLAT TO ACCOMPANY PETITION FOR A SPECIAL  
HEARING FOR TRANSITION REQUIREMENTS AND  
VARIANCES

Side yard setbacks of 15 and 8.5 feet in  
lieu of the required 20 feet

PARKING DATA

No. of people attending service = 16  
1 space per 4 seats = 4 spaces  
No. of spaces provided = 5 spaces



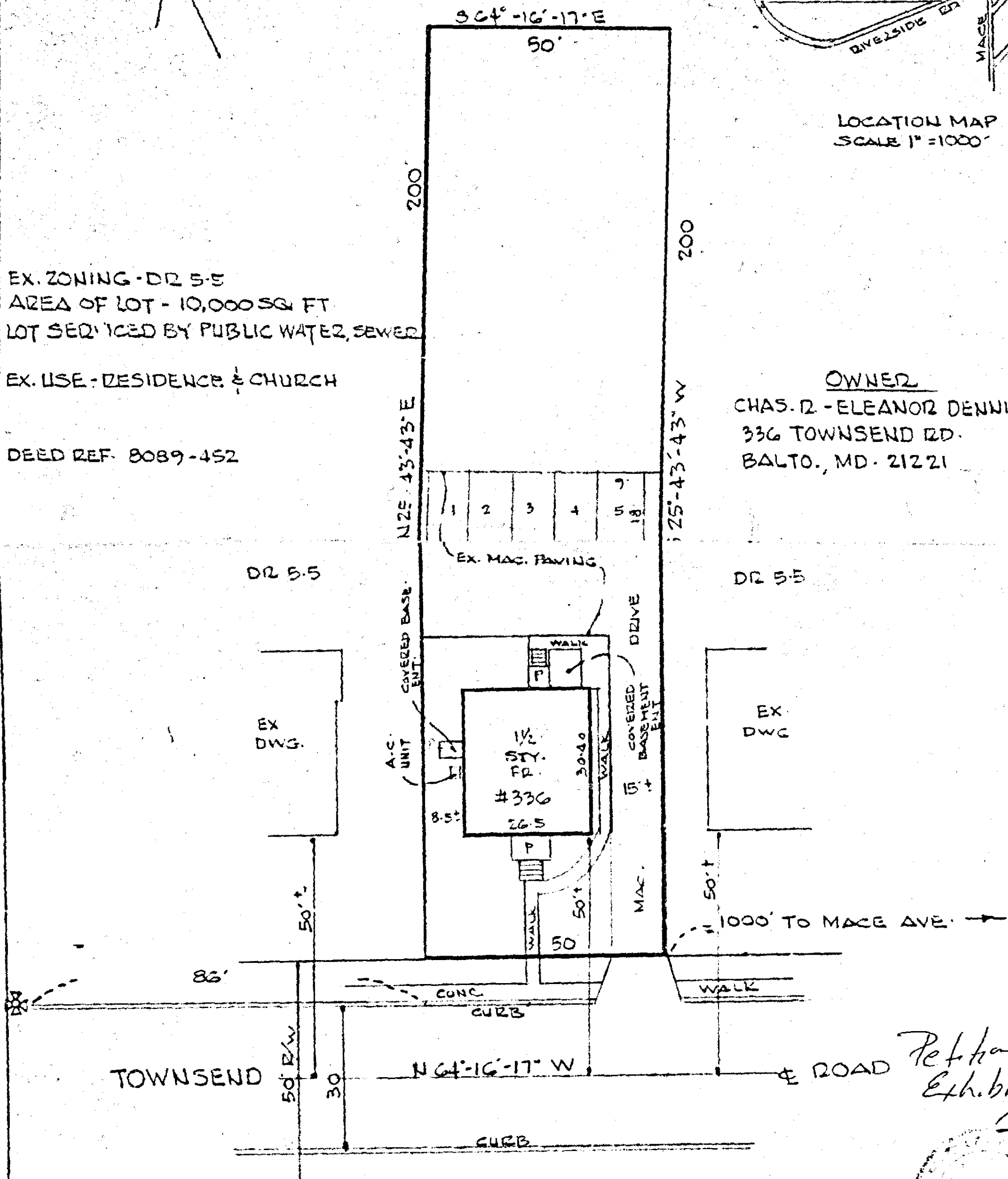
LOCATION MAP  
SCALE 1" = 1000'

EX. ZONING - DR 5-5  
AREA OF LOT - 10,000 SQ. FT.  
LOT SERVICED BY PUBLIC WATER, SEWER

EX. USE - RESIDENCE & CHURCH

DEED REF. 8089-452

OWNED  
CHAS. D. - ELEANOR DENNISON  
336 TOWNSEND RD.  
BALTO., MD. 21221



522

Petitioner's  
Exhibit  
1



FRANK S. LEE  
1277 NEIGHBORLY AVE.  
BALTIMORE, MD. 21221

LOT 12 SECTION "E"  
BACK RIVER HIGHLANDS  
PLAT BOOK 4/64-65  
15TH DISTRICT BALTIMORE CO, MARYLAND  
SCALE 1" = 20' DATE 4-12-89